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DEFECTS INVESTIGATION

Mr. Kenneth N. Weinstein
Associate Administrator for Safety Assurance
National Highway Traffic Safety Administration
400 Seventh Street, S.W.
Washington, D.C. 20590

00V-356.012

Subject: NHTSA Recall No. 00V356

Dear Mr. Weinstein:

As an alterer of Lincoln vehicles, United States Coachworks, Inc. is a manufacturer of limousines and has determined that certain of its vehicles manufactured in years 1998, 1999, and 2000, are in non-compliance with motor vehicle safety standard 110 (FMVSS 110). This report is submitted pursuant to Part 573 of the NHTSA regulations (49CFR, Part 573). The numbered sections below correspond to those set forth in Part 573.

- (c)1. United States Coachworks, Inc., 35 Carlough Road, Bohemia, New York 11716-2911, 1-800-729-1546.
- (c)2. All limousines stretched over sixty inches (60") manufactured in model years 1998, 1999, and 2000 on Lincoln Model 418 Town Car Chassis and equipped with P225/70R16 tires.
- (c)3. The total number of vehicles involved is: 1048.
- (c)4. It is estimated that 100% of all such vehicles are in non-compliance.
- (c)5. It appears that the stretching of these vehicles beyond 60" has caused a weight distribution on the vehicle front end which would exceed the 88% (i.e. 1601#) of maximum load rating of the tires (as calculated in accordance with FMVSS 109) by approximately 200 pounds.
- (c)7. The determination was made based upon information provided by Lincoln that their testing and analysis indicated such discrepancy.
- (c)8. Ford Motor Co. has agreed to conduct the entire recall to remedy this non-compliance for all Ford QVM manufacturers. Ford has developed a new Michelin tire, successfully tested to all standards, with a rating of 2150# maximum load, 1892# at 88% rating, to be used in the campaign. It's designation is 22570R16 107 Reinforced. The recall will be performed at no charge to QVM manufacturers and their consumers, and it will proceed in three stages, as quantity of retrofit tires become available. Four new tire molds are being manufactured to facilitate this production.

Stage one.

All QVM Manufactured cars slated to be displayed at the Atlantic City Limousine Show on November 6, 2000 will be retrofitted immediately and prior to the show.



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Stage two.

The second run of 5000 tires will be shipped directly to manufacturers to retrofit all inventory "on hold". It is expected that these tires will be shipped by 11/2/00.


Stage three.

By mid-November, Ford will send letters to all affected QVM consumers advising them of the recall. It is expected that by the end of November retrofit tire production will approximate 1750/wk. to handle the recall estimated at approximately 10,000 vehicles.

(c)9. Ford Motor Co. will forward all appropriate notices to NHTSA.

This letter is not an admission of legal liability.

Sincerely yours,



John H. Gore
Chief Executive Officer